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**From:** Rice, Stephanie F [srice@blm.gov]  
**Sent:** 4/20/2022 10:07:55 PM  
**To:** Boldrick, Lauren [Boldrick.Lauren@epa.gov]; Chu, Rebecca [Chu.Rebecca@epa.gov]  
**CC:** Zachary Huff [zhuff@dowl.com]; Kristen Hansen [khansen@dowl.com]; Donna Robinson [drobinson@dowl.com]  
**Subject:** RE: [EXTERNAL] RE: EPA Comments on Willow Admin Draft SEIS

Let's aim for Friday, that sounds like it will work best for everyone. I'll send out a meeting invite, please feel free to forward it as needed to your folks.

Stephanie Rice  
Natural Resources Specialist  
BLM Alaska State Office  
Phone: 907 271 3202

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**From:** Boldrick, Lauren <Boldrick.Lauren@epa.gov>  
**Sent:** Wednesday, April 20, 2022 12:57 PM  
**To:** Rice, Stephanie F <srice@blm.gov>; Chu, Rebecca <Chu.Rebecca@epa.gov>  
**Cc:** Zachary Huff <zhuff@dowl.com>; Kristen Hansen <khansen@dowl.com>; Donna Robinson <drobinson@dowl.com>  
**Subject:** RE: [EXTERNAL] RE: EPA Comments on Willow Admin Draft SEIS

Hi Stephanie,

How about either: 4/26 @ 11 AM or 4/29 @ 12 PM?

Related to the alternatives discussion – I would like to chat about what geological information is included in the DEIS. We would like to chat about how the on-going Alpine incident information will be incorporated. And, we would like to talk about the recent news about BLM being able to do compensatory mitigation. If there are any updates about how Nuiqsut is thinking through their issues with the project, we would be interested in that.

Thank you!

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**From:** Rice, Stephanie F <srice@blm.gov>  
**Sent:** Wednesday, April 20, 2022 12:41 PM  
**To:** Boldrick, Lauren <Boldrick.Lauren@epa.gov>; Chu, Rebecca <Chu.Rebecca@epa.gov>  
**Cc:** Zachary Huff <zhuff@dowl.com>; Kristen Hansen <khansen@dowl.com>; Donna Robinson <drobinson@dowl.com>  
**Subject:** RE: [EXTERNAL] RE: EPA Comments on Willow Admin Draft SEIS

Sounds good Lauren, which topics would you all like to discuss? I want to make sure we have the right people on the call and give them a heads up on the agenda. I'm available all day Friday and I have some availability on Tuesday as well.

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**From:** Boldrick, Lauren <Boldrick.Lauren@epa.gov>  
**Sent:** Wednesday, April 20, 2022 12:33 PM  
**To:** Rice, Stephanie F <srice@blm.gov>; Chu, Rebecca <Chu.Rebecca@epa.gov>  
**Cc:** Zachary Huff <zhuff@dowl.com>; Kristen Hansen <khansen@dowl.com>; Donna Robinson <drobinson@dowl.com>  
**Subject:** [EXTERNAL] RE: EPA Comments on Willow Admin Draft SEIS

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Hi Stephanie,

After we got a chance to dig into the PDEIS – there are a few different topics we'd like to chat about with you. What's your availability to have a meeting next week? Tuesday and Friday are pretty good availability-wise for us.

Thank you.

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**From:** Rice, Stephanie F <[srice@blm.gov](mailto:srice@blm.gov)>

**Sent:** Wednesday, April 20, 2022 11:02 AM

**To:** Boldrick, Lauren <[Boldrick.Lauren@epa.gov](mailto:Boldrick.Lauren@epa.gov)>; Chu, Rebecca <[Chu.Rebecca@epa.gov](mailto:Chu.Rebecca@epa.gov)>

**Cc:** Zachary Huff <[zhuff@dowl.com](mailto:zhuff@dowl.com)>; Kristen Hansen <[khansen@dowl.com](mailto:khansen@dowl.com)>; Donna Robinson <[drobinson@dowl.com](mailto:drobinson@dowl.com)>

**Subject:** EPA Comments on Willow Admin Draft SEIS

Lauren and Rebecca, I'm going through the comments submitted on the admin Draft SEIS and I have a question on the below comment submitted by EPA:

"BLM has eliminated potential alternatives from analysis that include reducing the number and/or size of drill pads. The stated reason for elimination from further consideration was that option component "Would not allow CPAI to exercise their rights under their leases to extract all the oil and gas possible within the leased areas. Leases provide the lessee the right to extract all of the oil and gas resources within the lease, subject to regulation. Drill pads have already been optimized to the minimum size needed for the proposed activity (e.g., 20-foot wellhead spacing). Drill pad locations have already been optimized to provide maximum accessibility to the resources based on existing extended-reach drilling technology and reservoir location and characteristics." However, the recent Alaska district Court decision found that BLM leases "do not grant the lessee the unfettered right to drill wherever it chooses or categorically preclude BLM from considering alternative development scenarios" and that BLM is compelled to "mitigate reasonably foreseeable and significantly adverse effects on the surface resources of the National Petroleum Reserve in Alaska" per 42 USC 6506a(b). As such, EPA finds that the rationale carried through on the elimination of Component Number 28 within Appendix D.1 inadequate.

EPA recommends that BLM consider a reasonable alternative that further reduces surface occupancy and impacts of the proposed projects beyond the reductions evaluated in Alternative E, even if that may involve less long-term production of oil and gas."

Is there a specific pad you feel should be dropped/moved to reduce surface impacts? Item 28 on the alternatives considered but eliminated matrix refers to all the different layouts that were considered in developing Alternative E, is there a different configuration you feel is better than Alt E? I was a little surprised to see this comment since we discussed variations on Alt E extensively in the cooperating agency workshops last fall and I wasn't aware the EPA wanted to see further reductions in surface infrastructure.

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